

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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JANE DOE,	:
	:
Plaintiff,	:
	:
v.	:
	:
LEON BLACK,	:
	:
Defendant.	:
-----X	

Civil Case No.: 1:23-cv-06418

**DECLARATION OF JEANNE M. CHRISTENSEN IN SUPPORT
OF PLAINTIFF’S MOTION TO PROCEED ANONYMOUSLY**

I, Jeanne M. Christensen, hereby declare as follows:

1. I am a partner at Wigdor LLP and counsel for Plaintiff Jane Doe.
2. I make this Declaration in support of Plaintiff’s motion to proceed anonymously.
3. The identity of Plaintiff Jane Doe was confidentially disclosed to counsel for Defendants prior to the filing of the Complaint.
4. The Complaint was filed on July 25, 2023.
5. On July 27, 2023, a large white Suburban parked outside Ms. Doe’s residence with a person inside who did not exit the vehicle. The vehicle, bearing a Virginia plate TSH-8289, remained there, parked just feet from the family’s driveway.
6. Attached hereto as **Exhibit 1** is a true and accurate photo taken of this white Suburban while parked outside. The photo was taken of the car from inside the house where Ms. Doe resides. The Suburban did not leave until local police were called.
7. On Monday August 7, 2023, Ms. Doe’s parents came home at around 2:00 pm to find two men waiting outside. Ms. Doe’s minor child was with her parents. The two men told them that they were fraud investigators from Florida and were there to interview them.

8. In addition to the two investigators offering a fresh “cheesecake” to her parents, the two men showed her parents several photos of Ms. Doe’s minor child that they had in their possession.

9. Blindsided, Ms. Doe’s parents allowed the two men into their home. The men asked her parents numerous questions about Ms. Doe’s childhood and personal medical history. They also requested to see photos of Ms. Doe when she was a child and an adolescent.

10. The men further asked Ms. Doe’s minor child questions. They recorded the questioning.

11. The investigators told her parents that they were from SIC, Inc., based in Miami, Florida, and gave an email address that matched the one on a website for SIC, Inc., <https://sicflorida.com/>.

12. The following day, Tuesday August 8, 2023 two men showed up at Ms. Doe’s father’s sister’s house. They said that they were fraud investigators there on business in connection with a lawsuit involving Ms. Doe and gave her a business card representing they were with SIC, Inc.

13. Ms. Doe’s aunt immediately contacted Ms. Doe, and thereafter told the two “fraud investigators” to leave.

14. Also on August 8, 2023, a childhood friend of Ms. Doe was told by her neighbors that two men were waiting outside of her residence during the day. She also found a business card with the name SIC, Inc.

15. In connection with the filing of Ms. Doe’s Complaint, Susan Estrich, an attorney representing Leon Black has told multiple media outlets that, “This is a frivolous and sanctionable lawsuit.” One example of such a statement is located in this article,

<https://www.forbes.com/sites/johnhyatt/2023/07/25/lawsuit-alleges-leon-black-raped-an-autistic-16-year-old-in-jeffrey-epsteins-manhattan-townhouse/?sh=6923a62a7e64>.

16. Another woman has a pending action against Black in which she alleges he sexually assaulted her. In that case, *Pierson v. Black*, Index No. 952002/2022, filed on November 28, 2022 in New York Supreme Court, New York County, after Ms. Pierson dared to use her actual name, Black's private investigators spent weeks drudging up information about Pierson that any reasonable person would be humiliated and horrified to learn was publicly filed on a court docket.

17. Abhorrently, Black attached over 230 pages as "exhibits" to a baseless "sanctions" motion in the Pierson case with information about her past that had absolutely nothing to do with Black's legal defenses to the civil claims asserted against him. *Pierson*, ECF No. 14.

18. In this action, Plaintiff has not spoken publicly about the incidents that underly the causes of action in her Complaint.

Dated: August 10, 2023
New York, New York


Jeanne M. Christensen